

3. Park resides with his family in Hunt County for years and has been active in the community as well as the business community. He has enjoyed a reputation for high character and the fine behavior.

4. Martin's Statements were intentionally made.

5. Martin's Statements were made with the intent to harm Park's reputation and cause Park injury, including mental anguish.

6. Martin's Statements about Park were willful and malicious.

7. Martin intended the consequences of his Statements to cause Park harm.

8. As a direct and proximate result of Martin's Statements, Park has suffered damages.

9. As a direct and proximate result of Martin's Statements, Park has suffered damages to his reputation.

10. As a direct and proximate result of Martin's Statements, Park has suffered mental anguish.

11. As a direct and proximate result of Martin's Statements, Park has suffered mental anguish damages in the amount of \$_____.

12. As a direct and proximate result of Martin's Statements, Park has suffered damages to his reputation in the amount of \$_____.

13. As a result of Martin's Statements, Park has suffered nominal damages in the amount of \$_____.

14. Martin's Statements were made with actual malice, and there is clear and convincing evidence of such actual malice.

15. Park is entitled to exemplary damages against Martin in the amount of \$_____.

Conclusions of Law

1. Martin's Statements about Park were orally communicated to a third person, were defamatory and constitute slander per se, and were without legal excuse.
2. Martin's Statements were made willfully and maliciously, as Martin knew the Statements were false and made the Statements intentionally and deliberately to cause Park harm and damages, including to injure Park's reputation and cause him mental anguish.
3. Park is entitled to a judgment against Martin in the amount of \$_____.
4. Martin's debt to Park arises from a willful and malicious injury and therefore pursuant to 11 USC Section 523(a)(6), it is non-dischargeable.

Respectfully submitted,

/s/ Scott E. Hayes

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ATTORNEYS FOR PLAINTIFF NATHAN PARK

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been sent to Jason Martin on this 3rd day of July 2023.

**Via First Class Mail &
CMRRR:**

Jason Martin
1016 Sycamore Street
Burleson, Texas 76028

/s/ Scott Hayes
Scott Hayes